

Fact Sheet Language

Facility Optimization Study

Facilities that receive a nutrient variance must evaluate current facility operations to optimize nutrient reduction with existing infrastructure and analyze other cost-effective methods of nutrient load reductions. DEQ-12B allows for flexibility regarding the scope and content of the study but requires that the optimization study includes, but is not limited to, an assessment of nutrient trading feasibility within the watershed without substantial investment in new infrastructure.

DEQ may request the permittee provide the results of the optimization study/nutrient reduction analysis within two years of receiving the variance. This permit requires the completion of an optimization study/nutrient reduction analysis including an assessment of trading with a two year compliance schedule, as summarized in **Table X** below.

Table X: Compliance Schedule			
Action	Frequency	Scheduled Completion Date of Action⁽¹⁾	Report Due Date⁽²⁾
Complete a Facility Optimization Study	Single Event	No Later than Two Years from the Effective Date of the Permit	NA
Submit Notification that the Facility Optimization Study is Complete	Single Event	No Later than Two Years from the Effective Date of the Permit	No Later than the 28 th of the Month Two Years from the Effective Date of the Permit
Footnotes: NA = Not Applicable (1) The actions must be completed on or before the scheduled completion dates. (2) This notification must be received by the DEQ on or before the scheduled due date.			

DEQ-12B encourages optimization studies include, but are not be limited to, facility operations and maintenance, reuse, recharge, and land application. However, DEQ-12B clarifies that the changes to facility operations resulting from the analysis carried out are only intended to be refinements to the wastewater treatment system already in place, addressing changes to facility operation and maintenance. Optimizations are not intended to include changes to the facility resulting in structural modification, user rate increases, or substantial capital investment.

Permit Language

In the Special Conditions section of the permit

Facility Optimization Study

The permittee must complete a Facility Optimization Study and Nutrient Reduction Analysis. The Study must include an analysis of nutrient trading feasibility within the watershed. Written notification indicating completion and availability of the Study results must be submitted to the Department as described in Part I.F. of this permit.

In the Compliance Schedule section of the permit

The actions listed in **Permit Table X** below must be completed on or before the respective scheduled completion dates. The completion of all actions or deliverables must be reported to the Department at the address listed in Part II.D. of the permit and in accordance with the signatory requirements of Part IV.G. of the permit.

Permit Table X: Compliance Schedule			
Action	Frequency	Scheduled Completion Date of Action⁽¹⁾	Report Due Date⁽²⁾
Complete a Facility Optimization Study and Nutrient Reduction Analysis	Single Event	By (2 years after effective date)	NA
Submit Notification that the Facility Optimization Study and Nutrient Reduction Analysis is Complete	Single Event	By (2 years after effective date)	(Due 28 th of the month following scheduled completion date)
Footnotes: NA = Not Applicable (1) The actions must be completed on or before the scheduled completion dates. (2) This notification must be received by the Department on or before the scheduled due date.			